

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD FEBRUARY 1, 2022 THROUGH FEBRUARY 28, 2022**

Debtor: LTL Management LLC

Applicant: Bates White, LLC

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition Date")

---

**SECTION 1  
FEE SUMMARY**

☐ Interim Fee Application No. \_\_\_\_\_ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from February 1, 2022 through February 28, 2022 (the "Fourth Statement Period").

Total Fees – LTL Bankruptcy:	\$263,057.50
Total Fees – Imerys Bankruptcy (50% of total):	+ \$0.00
Total Fees:	\$263,057.50
Total Disbursements:	+ \$741.72
Total Fees Plus Disbursements:	\$263,799.22
Minus 20% Holdback of Fees:	– \$52,611.50
Amount Sought at this Time: <sup>1</sup>	\$211,187.72

---

<sup>1</sup> Pursuant to Bates White's agreement with Jones Day, on behalf of the Debtor, Bates White will provide a prompt payment discount ("PPD") of 5% on its professional fees provided Bates White receives payment of its monthly invoice within sixty (60) days of presentation. Further, pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals* [Dkt. 761] (the "Interim Compensation Order"), Bates White may seek payment from the Debtor for the Fourth Statement Period (the "Interim Amount") representing (a) 80% of Bates White's fees and (b) 100% of its incurred expenses. The Total Fees reported above are before applying the prompt pay discount. Should Bates White receive payment within 60 days of the date of the invoice (attached as Exhibit A) for the Interim Amount, Bates White would apply a 5% credit of \$13,152.88 = \$263,057.50 x 5%. Bates White will provide this credit on the monthly invoice following the receipt of the prompt payment.

	<u>FEES</u>	<u>EXPENSES</u>	<u>TOTAL</u>
Total Previous Fees Requested:	<u>\$579,305.00</u>	<u>\$1,007.51</u>	<u>\$580,312.51</u>
Total Fees Allowed to Date:	<u>\$0.00</u>	<u>\$0</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>\$0.00</u>	<u>\$0</u>	<u>\$0.00</u>
Total Holdback (If Applicable):	<u>\$115,861.00</u>	<u>n/a</u>	<u>\$115,861.00</u>
Total Received by Applicant:	<u>\$443,900.84<sup>2</sup></u>	<u>\$1,007.51</u>	<u>\$444,908.35</u>

---

<sup>2</sup> The total fees received by Bates White as reported in this table reflects the 5% PPD credited to the Debtor for prompt payment the invoices associated with the First, Second, and Third Monthly Fee Applications.

**Summary by timekeeper included in this Fee Application – LTL Bankruptcy**

<b>Name of Professional</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Fees</b>
Evans, Andrew	Partner	\$825	16.4	\$13,530.00
Grinberg, Rachel	Partner	\$900	3.6	\$3,240.00
Lobel, Scott	Partner	\$750	73.0	\$54,750.00
Mullin, Charles	Partner	\$1,150	32.5	\$36,972.50
Aharoni, Assaph	Manager	\$600	42.7	\$25,620.00
Peters, Sarah	Manager	\$600	35.0	\$21,000.00
Cumbo, Peter	Senior Consultant	\$460	0.4	\$184.00
Coleman, Nathan	Consultant II	\$390	104.7	\$40,833.00
Osgood, Jessie	Consultant II	\$390	6.8	\$2,652.00
Stewart, Samantha	Consultant II	\$410	95.7	\$39,237.00
Weiss, David	Consultant	\$365	68.6	\$25,039.00
<b>TOTAL</b>			<b>479.4</b>	<b>\$263,057.50</b>

**Summary by timekeeper included in this Fee Application – Imerys Bankruptcy**

<b>Name of Professional</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Fees</b>
N/A			N/A	N/A
<b>TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>
<b>50% OF TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>

**SECTION II  
SUMMARY OF SERVICES**

<b>SERVICES RENDERED – LTL BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
Analysis	76.2	\$56,885.50
Client Communication	7.3	\$6,552.50
Data Gathering & Processing	298.1	\$124,721.50
Fee Request Preparation	34.8	\$22,677.00
Project Management	33.0	\$23,452.50
Research	7.9	\$3,756.00
Testimony	21.4	\$24,610.00
Travel	0.7	\$402.50
<b>SERVICES TOTAL</b>	<b>479.4</b>	<b>\$263,057.50</b>

<b>SERVICES RENDERED – IMERY'S BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
N/A	N/A	N/A
<b>SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>
<b>50% OF SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENT TYPE – LTL BANKRUTPCY</b>	<b>AMOUNT</b>
Travel	\$741.72
<b>DISBURSEMENTS TOTAL</b>	<b>\$741.72</b>

<b>DISBURSEMENT TYPE – IMERYS BANKRUTPCY</b>	<b>AMOUNT</b>
N/A	
<b>DISBURSEMENTS TOTAL</b>	<b>\$0.00</b>

**SECTION IV  
CASE HISTORY**

1. Case Filed: October 14, 2021 (the “Petition Date”)
2. Chapter under which case commenced: Chapter 11
3. Date of Retention: February 15, 2022, effective as of the Petition Date [Dkt. 1483] (the “Retention Order”).<sup>3</sup>
4. Summary explaining the nature of the work performed and the results achieved:<sup>4</sup>

During the Fourth Statement Period, Bates White provided the following services including, but not limited to:

- Analyzing issues related to the motions to dismiss.
- Dr. Mullin’s deposition and hearing testimony related to the motions to dismiss, and related preparation.
- Processing and analyzing the Debtor’s claims data.
- Preparing the Third Monthly Fee Statement.

I certify under penalty of perjury that the above is true.

Dated: April 1, 2022  
Falls Church, VA

Respectfully submitted,

/s/ Scott M. Lobel

Scott M. Lobel  
BATES WHITE, LLC  
2001 K Street NW  
North Building, Suite 500  
Washington, DC 20006  
Telephone: (202) 408-6110  
Facsimile: (202) 408-7838  
E-mail: scott.lobel@bateswhite.com

TALC CONSULTANTS FOR DEBTOR

---

<sup>3</sup> The Retention Order is attached hereto as Exhibit B.

<sup>4</sup> The invoice detail and expense detail submitted hereto as Exhibit C and Exhibit D, respectively, includes detailed time and expense entries summarizing the professional services rendered by Bates White, LLC as talc consultants to the Debtor in the LTL Bankruptcy.